RICE LAW, PLLC
105 N. 6th Street · Wilmington, North Carolina 28401

July 20, 2026

VIA ELECTRONIC MAIL

Chief J. B. Bailey
Kure Beach Police Department
114 N. 7th Avenue
Kure Beach, North Carolina 28449

cc: Office of the Town Attorney, Town of Kure Beach

RE: June 30, 2026 Public Records Request — Response to the Town's Supplemental Responses; Acceptance of the Narrowed-Request Agreement; One Remaining Field

Dear Chief Bailey:

Thank you. I want to begin there, because it is warranted and because the rest of this letter is short as a result.

What the Town produced, and why it matters

The Town produced the Network Audit for March 1 through May 31, 2026 with the Organization Name field intact. That is 1,391,951 search records identifying 3,499 separate organizations that queried Kure Beach's cameras. It is the single most useful record any agency has given us, and it is the exact record New Hanover County continues to withhold. I do not take it for granted.

The Town also produced the adopted ALPR policy of January 27, 2026, resolving my objection to the July 13 draft; the memorandum of understanding with the State Bureau of Investigation; the shared-networks list; the network-discoverability configuration; and the camera locations. Most of my June 30 request is now satisfied.

I accept the Town's proposed agreement, and I accept it now

The Town asks to enter the same narrowed-request agreement I offered New Hanover County in my June 18, 2026 letter, and redacts the user field pending that agreement.

I accept. This letter is that agreement. **I do not seek the identity of any individual officer or user, and I withdraw any request for that information as to the Town of Kure Beach.** The Town need not wait on anything further from me, and it need not condition any part of its production on my agreement, which is given here without reservation.

I also do not contest the redaction of the license-plate fields under N.C. Gen. Stat. § 20-183.32(e). Those are captured plate data and the statute reaches them.

What is left is one field

The Network Audit was produced with the Reason field empty in every row — 0 of 1,391,951.

I do not believe this is a redaction. Nothing in the Town's supplemental responses claims to withhold the Reason field, and the Town redacted only the user and plate fields, each with an explanation. I think this is an artifact of how the report was generated.

The reason I am confident the field can be produced is that a peer North Carolina agency produced it. **North Carolina A&T State University Police** released its Flock Network Audit for the same three-month window. That export contains **1,390,776 rows — within one tenth of one percent of the Town's — and the Reason field is populated in 1,390,733 of them, or 100.0%.** Same vendor, same report, same period. One carries the reasons; the other does not.

So my request is narrow: please regenerate and produce the Network Audit for March 1 – May 31, 2026 with the Reason field populated. The user and plate fields may remain redacted.

The reason codes matter more than any other outstanding item. The Town's own officers ran 816 searches in that period, and the Reason field is populated for all of them — 275, or roughly a third, are traffic infractions. What we cannot see is why 3,499 outside agencies ran 1.39 million searches. That question is the heart of the public interest here, and the answer already exists in the system.

Three places where the responses and the files do not match

I raise these as discrepancies rather than accusations. Each may be an export problem rather than a decision.

1. **Case numbers.** The response to Item 4 states the Organization Audit is produced "with the case number fields populated." In the files produced, the Case

and Case # columns are empty in all 816 rows across all three monthly exports. I checked both columns in each file.

2. Data-export events. The response to Item 6 states the Event Log is produced "with data export events set forth therein." The 644 entries produced consist of networkShare (369), shareRequest (199), role (44), custom hotlist entries (17), user (5), organization (5), and networkShareSettings (1). No export events and no logins appear.

3. Entity details. The Entity Details column of the Event Log is empty in all 644 rows. Without it, an entry recording a network share does not say which network was shared.

One record referenced but not produced

4. The SBI User Agreement. The certification produced under Item 3 instructs the agency head to "read, review and understand the requirements outlined in the attached User Agreement." The certification page was produced; the User Agreement it incorporates was not.

Timing, and an offer

Please respond by Monday, August 3, 2026. If the Reason field can be regenerated sooner than the balance, I would rather have it on a rolling basis than wait for a complete production.

If a conversation would be faster than correspondence, I am glad to speak with you, with the Town Attorney, or with both, at your convenience and including outside business hours. If Flock's support desk needs to be involved to regenerate the audit with the Reason column, I will join that call and put the question to them directly.

Thank you for your time and for the work this production plainly took.

Sincerely,

/s/ Mark Spencer Williams

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